

KING & SPALDING

King & Spalding LLP
1185 Avenue of the Americas
New York, NY 10036-4003

Tel: (212) 556-2100
Fax: (212) 556-2222
www.kslaw.com

Arthur Steinberg
Direct Dial: 212-556-2158
asteinberg@kslaw.com

December 11, 2014

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC ("**New GM**") in the above-referenced matter. We write to update the Court regarding developments in proceedings relating to New GM's Motions to Enforce. Specifically, an issue was raised by Lead Counsel in MDL 2543 with respect to whether motions to dismiss with regard to the Post-Sale Consolidated Complaint should go forward in MDL 2543 before this Court rules on the Old GM Claim Threshold Issue (as defined in this Court's Scheduling Order dated July 11, 2014).¹ In connection with this issue, attached hereto are the following briefs which have been filed in MDL 2543:

First, attached hereto as Exhibit "1" is *General Motors LLC's Motion And Memorandum In Support To Defer All Briefing On Plaintiffs' Post-Sale Consolidated Complaint Until After The Bankruptcy Court Decides The Pending Motions To Enforce*, dated November 25, 2014 (without Exhibits) [MDL Dkt. No. 439].

¹ Designated Counsel's brief on the Old GM Claim Threshold Issue is due to be filed on December 16, 2014, the day after the next status conference in MDL 2543 (*i.e.*, December 15, 2014 at 9:30 a.m.).

Honorable Robert E. Gerber
December 11, 2014
Page 2

Second, attached hereto as Exhibit "2" is *Plaintiffs' Brief Re: General Motors LLC's Obligation To Answer Or Otherwise Respond To Plaintiffs' Post-Sale Consolidated Complaint*, dated November 25, 2014 (without Exhibits) [MDL Dkt. No. 440].

Third, attached hereto as Exhibit "3" is *General Motors LLC's Response In Support Of Deferring All Briefing On Plaintiffs' Post-Sale Consolidated Complaint Until After The Bankruptcy Court Decides The Pending Motions To Enforce*, dated December 10, 2014 (without Exhibits) [MDL Dkt. No. 468].

Fourth, attached hereto as Exhibit "4" is *Plaintiffs' Response Brief Re: General Motors LLC's Obligation To Answer Or Otherwise Respond To Plaintiffs' Post-Sale Consolidated Complaint*, dated December 10, 2014 [MDL Dkt. No. 467].

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

cc: Honorable Jesse M. Furman
Edward S. Weisfelner
Howard Steel
Elihu Inselbuch
Peter Van N. Lockwood
Sander L. Esserman
Jonathan L. Flaxer
S. Preston Ricardo
Matthew J. Williams
Lisa H. Rubin
Keith Martorana
Daniel Golden
Deborah J. Newman
Jamison Diehl
William Weintraub
Eamonn O'Hagan
Steve W. Berman
Elizabeth J. Cabraser
Robert C. Hilliard